

ARIEL E. STERN, ESQ.
Nevada Bar No. 8276
NATALIE L. WINSLOW, ESQ.
Nevada Bar No. 12125
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
NICHOLAS E. BELAY, ESQ.
Nevada Bar No. 15175
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: ariel.stern@akerman.com
Email: natalie.winslow@akerman.com
Email: scott.lachman@akerman.com
Email: nicholas.belay@akerman.com

Attorneys for NewRez LLC dba Shellpoint Mortgage Servicing

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEWREZ LLC DBA SHELLPOINT
MORTGAGE SERVICING,

Plaintiff,

vs.

JOEL A. STOKES AND SANDRA F. STOKES,
as trustees of the JIMI JACK IRREVOCABLE
TRUST; DOE INDIVIDUALS I-X, inclusive,
and ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00946-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES TO RESPOND TO
SUMMARY JUDGMENT MOTIONS
(ECF NOS. 45, 46)**

(SIXTH REQUEST)

Due to ongoing settlement discussions, plaintiff NewRez LLC dba Shellpoint Mortgage Servicing (**Shellpoint**) and defendants Joel A. Stokes and Sandra F. Stokes, as Trustees of the Jimijack Irrevocable Trust (**the Trust**), by and through their attorneys of record, stipulate and agree that the parties shall have an additional twenty-one (21) days, up to and including **Monday, August 15, 2022**, to file their respective responses to the pending summary judgment motions (ECF Nos. 45, 46). The current deadline is Monday, July 25, 2022.

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The parties understand that a sixth extension request is extraordinary, and do make this request lightly. However, the parties are engaged in serious settlement negotiations that would alleviate the need to respond and reply to summary judgment motions. The parties have exchanged six-figure settlement offers and believe settlement is a realistic possibility. The parties will either respond to summary judgment motions or file a notice of settlement on August 15, 2022.

The extension is requested in good faith and is not for purposes of delay or prejudice to any party. The parties do not request a court-ordered mediation at this time given undersigned counsel's history in settling quiet title matters.

DATED: July 21, 2022.

AKERMAN LLP

/s/ Scott R. Lachman

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Nevada Bar No. 8276

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NICHOLAS E. BELAY, ESQ.

Nevada Bar No. 15175

1635 Village Center Circle, Suite 200

Las Vegas, NV 89134

*Attorneys for NewRez LLC dba Shellpoint
Mortgage Servicing*

HONG & HONG LAW OFFICE

/s/ Joseph Y. Hong

JOSEPH Y. HONG, ESQ.

Nevada Bar No. 5995

1980 Festival Plaza Drive, Suite 650

Las Vegas, NV 89135

*Attorneys for Joel A. Stokes and Sandra F.
Stokes, as Trustees of the Jimijack Irrevocable
Trust*

IT IS SO ORDERED.

James C. Mahan
UNITED STATES DISTRICT JUDGE

Case No.: 2:20-cv-00946-JCM-BNW

DATED: July 22, 2022

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572